

Summary of Scoping Comments Giacomini Wetlands Restoration Project

National Park Service Point Reyes National Seashore

Introduction

The National Park Service (NPS), in conformation with the National Environmental Policy Act (NEPA), conducted public scoping for the Giacomini Wetlands Restoration Project Environmental Impact Statement (EIS)/Environmental Impact Report (EIR). Public scoping is held early in the NEPA process in order to elicit public input on the range of concerns, issues and alternatives that should be addressed within the EIS/EIR. A joint document is being prepared by the Park Service as lands belonging to the State Lands Commission may be directly or indirectly impacted by the proposed Project, and the State Lands Commission has agreed to participate as a cooperating agency. This summary informs the public and the NPS on the extent and nature of the comments received during scoping.

Background on Public Scoping Process

A Notice of Intent (NOI) to prepare an EIS and conduct public scoping was printed in the Federal Register on September 23, 2002. On September 25, 2002, a copy of the NOI and scoping information was sent to 45 adjacent landowners to the project site and 163 persons and organizations on a public review request list maintained by the Seashore. On October 4, 2002, the NOI was distributed to the Governor's Office of Planning and Research State Clearinghouse for distribution to relevant state agencies (SCH# 2002114002).

On October 2, 2002, a press release announcing public scoping was distributed to the *Point Reyes Light*, *Marin Independent Journal*, and *Press Democrat*, as well as 28 other media outlets, including newspapers, radio stations, and television stations. The press release noted that public scoping would occur as an agenda item at the Golden Gate National Recreation Area/Point Reyes National Seashore Advisory Commission meeting on October 19, 2002, at the Dance Palace in Point Reyes Station. The press release was also posted on the Seashore's website. A notice of the public scoping was printed in the *Point Reyes Light* newspaper on October 3, 2002.

The Park Service mailed 1,380 notices announcing the public Advisory Commission meeting on October 1, 2002, listing the Giacomini Wetlands Restoration Project as an agenda item for the October 19, 2002 meeting.

Approximately 30 to 40 members of the public attended the October 19, 2002 Advisory Commission meeting. The *Point Reyes Light* published an account of the meeting on October 24, 2002.

The 45-day public scoping period closed November 8, 2002. Due to delays at the State Clearinghouse in distributing the NOI, the scoping period for state agencies was extended to December 6, 2002.

Review of Scoping Letters

To ensure that all comments and/or issues raised in letters or oral comments received during the scoping period were noted and summarized accurately, all of the letters received from both individuals, organizations, and agencies were reviewed by the following three people:

Lorraine Parsons
Wetlands Ecologist, Giacomini Wetlands Restoration Project Manager
Point Reyes National Seashore

Leslie Allen
Wetlands Ecologist
Point Reyes National Seashore

Wendy Poinsoot
Environmental Planner, Wildland Urban Interface Program
Golden Gate National Recreation Area
Point Reyes National Seashore

Comments and/or issues that shared a common theme were consolidated to the extent possible, and then a table was prepared that listed all of the issues and/or concerns under major issue headings (Appendix A).

Public Response to Scoping

Approximately 86 individuals or private organizations mailed, faxed, or emailed comments regarding the Giacomini Project prior November 8, 2002. Commenting organizations include the Environmental Action Committee of West Marin, Marin County Bicycle Coalition, Access4bikes, Manzanal Homeowners Association, and Audubon Canyon Ranch. The Seashore received comments from six (6) local, state, or federal agencies. Commenting agencies are the California Coastal Commission; North Marin Water District; Marin County Department of Parks, Open Space, and Cultural Services; Marin County Department of Public Works; and the State of California Department of Food and Agriculture and the County Supervisor for the Fourth District, Steve Kinsey.

This staff report consolidates the scoping comments under major issue headings. Two issue areas generated the greatest number of comments -- public access and emphasis on resource values. Approximately 60 individuals and organizations expressed general support for the development of either a bike path between Inverness/Inverness Park and Point Reyes Station or some form of multi-use public access. Approximately 30 individuals and organizations requested the NPS emphasize hydrologic integrity and habitat values of the wetland restoration project over public access considerations.

Written comments received by the NPS and the minutes from the October 19, 2002, Advisory Commission meeting are available for review at the Seashore Administration Building, 1 Bear Valley Road, Point Reyes, CA.

Appendix A. Summary of Comments From Giacomini Wetland Restoration Project Public Scoping.

No.	Issue Topic	Issue
PROJECT PLANNING		
1.	Document Scope	For the Project Area and surrounding lands, existing and recent past agricultural uses should be documented, using information on federal, state and county farmland categories and crop data.
2.	Document Scope	The environmental document should provide background on the acquisition process for the Project Area and explain why parcels on C Street in Point Reyes Station were not purchased.
3.	Project Scope	The Park Service should purchase the parcels along C Street in Point Reyes Station that are still owned by the Giacomini and include them in the Project Area and restoration process.
4.	Project Scope	The Wildlife Conservation Board lands adjacent to the town of Point Reyes Station and south of the Giacomini Ranch should be incorporated into the Project Area for the project (i.e., include it in the restoration project).
5.	Project Scope	The project scope should be expanded to include an alternative design for Levee Road that would improve connectivity to Olema Marsh.
6.	Study Area Boundary	The Wildlife Conservation Board lands adjacent to the town of Point Reyes Station and south of the Giacomini Ranch should be incorporated into the Study Area for the project (i.e., include it in the environmental baseline studies and analyses conducted).
7.	NEPA Process	Public workshops on project alternatives should be held prior to the preparation of the environmental analysis.
8.	Permit Requirements	A Coastal Act consistency determination may be needed.
9.	Planning	Interest expressed in implementing at least some portion of project as quickly as possible.
ALTERNATIVES		
10.	Phased Approach	Interest expressed in idea of phasing project on 100 acres already managed. Were interested in whether Park Service would be using adaptive management approach.

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No.	Issue Topic	Issue
ALTERNATIVES (CONT.)		
11. .	Minimal Physical Changes	Physical changes should be the least disruptive needed to provide for the restoration process.
12.	Unberm Tomasini Creek	The portion of Tomasini Creek west of Mesa Road should be allowed to resume its natural slough course as called for by the Point Reyes Station Community Plan.
13.	Save New Duck Pond	Efforts should be made to save “Waldo’s Pond” (New Duck Pond) as a seasonal freshwater pond for wintering ducks.
14.	Support for No Project	Support was expressed for No Project Alternative, keeping Project Area as is currently, possibly including operation of the dairy ranch.
15.	Giacomini Parcels Not Purchased Incorporated Into One Alternative	An EIS/EIR alternative should be presented that includes lands not purchased by the Park Service along C Street in Point Reyes Station and along Sir Francis Drake in Inverness Park. Assessment of this alternative would enable the Park Service to evaluate the impact that omitting these parcels from the Project Area would have on the restoration project. It would also provide NEPA documentation should the Park Service acquire this parcels for inclusion into the restoration project in the future.
16.	Sedimentation and Flooding	Alternatives should strive to reduce sedimentation and flooding.
17.	Regrading of Levees	Levees should be graded to elevations and slopes that would allow regular overtopping during extreme tides, thereby encouraging high marsh habitat values and minimizing predator travel and den potential.
18.	Feasibility Study Alternatives	Interest expressed in how much the Park Service would be relying on the alternatives in the Feasibility Study produced by Philip Williams & Associates, Ltd., as a significant amount of public input was gathered at that time and used to develop the alternatives in that document.

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No.	Issue Topic	Issue
PUBLIC ACCESS		
19.	Bike Path	A need exists for a pedestrian/bike path or separate use paths between Inverness/Inverness Park and Point Reyes Station to improve traffic safety, expand trail network, and/or provide more direct access between the two towns. Public access must be considered now during wetland restoration planning to ensure that access options will be considered in project design. Suggestions included bridge across northern portion of property, bridge across southern portion of property, creation of path along east side of Sir Francis Drake, and use of old railroad berm on the east side of the Project Area at the base of the Point Reyes Mesa.
20.	Multi-Use Access Options	Multi-use public access opportunities should be provided (pedestrian, bikes, horses, dogs, etc.).
21.	Public Access Secondary	Hydrologic integrity and habitat value of restoration project should be emphasized over public access and recreation considerations.
22.	Limited Public Access	Recreational opportunities should be provided, but should emphasize opportunities for quiet and nature-watching and de-emphasize horses, dogs, bikes, etc.
23.	Impact on Adjacent Landowners	Recreational opportunities should consider impact of public access on adjacent landowners.
24.	Traffic Increase	Concern was expressed about the increase in traffic, parking, safety, and littering impacts in Point Reyes Station that would accompany public access of the Project Area.
25.	Levees as Public Access Paths	Levees provided for public access also cause habitat fragmentation and wildlife disturbance. Levees provide travel corridors for terrestrial predators that prey upon marsh species, including those species designated for protection under the federal and state Endangered Species Acts. Levees high enough for safe public access provide inferior habitat values for marsh wildlife compared to natural creek bank levees.
26.	Types of Public Access	Types of public access that are more compatible with habitat restoration such as elevated boardwalks, viewing platforms, etc., should be given higher consideration.

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No.	Issue Topic	Issue
PUBLIC ACCESS (CONT.)		
27.	Restrict Public Access	The project should not provide public access.
28.	Dairy Interpretative Opportunities	Some of the structures on the Giacomini Ranch should be retained for interpretative opportunities in keeping with the Ranch's rather unique status as a dairy directly adjacent to residential and commercial development.
29.	Dogs	The environmental document should assess the impact of dogs on vegetation and wildlife in the Project Area.
30.	Hunting	Hunting should be stopped or reduced on State Lands Commission Bivalve Channel area, and planning for the project should address how hunting will be controlled in the Project Area.
HYDROLOGY		
31.	Hydrologic Modeling	Hydrologic impacts of alternatives should be modeled using computer simulation, and models should cover not only intra-annual variation, but inter-annual variation.
32.	Impacts to Groundwater Wells	Impacts of the restoration project to groundwater quality (including salinity intrusion), and quantity in the North Marin Water District Coast Guard groundwater wells in Point Reyes Station should be evaluated. If impacts are identified, mitigation, including the funding of NMWD infrastructure, should be included.
33.	Indirect Impacts	The EIS should address the potential of the project to impact the eucalyptus grove at the end of A and B Streets in Point Reyes Station.
34.	Indirect Impacts	The impact of the restoration project on other areas in the Tomales Bay watershed, including Olema Marsh, should be evaluated.
35.	General Flood Risks	An evaluation of the 100-year flood elevations should be included in hydrologic analyses.
36.	Flood Risks to Sir Francis Drake and Levee Road	The potential for changes to, and specifically increases in, flooding to Sir Francis Drake and Levee Road should be evaluated, including the potential for any increases in associated maintenance.
37.	Water Quality Monitoring	A water quality monitoring program should be developed to evaluate effects of the project.

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No.	Issue Topic	Issue
HYDROLOGY (CONT.)		
38.	Fish Hatchery Flooding	Concern was expressed about aggradation of Fish Hatchery Creek on east side of Sir Francis Drake and the need to allow the creek to take a more direct route in joining with Lagunitas Creek.
39.	Tomasini Creek Culverts at Mesa Road	Problems with culverts at confluence of Tomasini Creek and Mesa Road might affect restoration efforts within Project Area downstream. Suggestion to build bridge on the county road instead.
40.	Freshwater Diversions	Efforts should be made to have the maximum possible freshwater inflows to Tomales Bay through minimization of water diversions.
41.	Point Reyes Station Run-Off	The environmental document should address potential impacts to the restoration project, and means to mitigate impacts, from contamination in runoff and directed discharge from Point Reyes Station.
42.	Flood Hazard Designation	The environmental document should locate the Project Area on FEMA Flood Insurance Rate Maps and Floodway Maps.
LAND USE PLANNING		
43.	C Street Parcels	Concern was voiced about the fate of lands along C Street in Point Reyes Station retained by Giacomini and the potential for future residential development.
44.	Town Character	Concern was expressed about how restoration project will affect the character/community of Point Reyes Station.
AGRICULTURE		
45.	Agriculture	The direct and cumulative impacts of the project on agriculture should be evaluated, including the impact of land conversion. Also, the potential indirect impacts to agriculture, such as an increase in crop predation and flooding and increased restrictions on agricultural practices, should be addressed
46.	Agriculture	A Land Evaluation and Site Assessment Analysis (using the California LESA model) should be conducted to assess the feasibility of payment of mitigation fees towards purchase of compensatory easements.

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AGRICULTURE (CONT.)		
47.	Agriculture	If indirect impacts to agriculture are identified, mitigation such as buffers and infrastructure improvements should be considered.
48.	Agriculture	Mitigation measures or project alternatives that would lessen or avoid project impacts on farmland should be discussed, including payment of mitigation fees to compensatory agricultural land conservation easements.
OTHER		
49.	Mosquitoes	Concern expressed about potential increase in mosquito population and concurrent increase in bats and birds from wetland restoration.